

COUNTY OF RIVERSIDE

TRANSPORTATION AND LAND MANAGEMENT AGENCY

George A. Johnson · Agency Director

Planning Department

Ron Goldman · Planning Director

February 16, 2010

California Energy Commission
ATTN: Alan Solomon, Project Manager
1516 Ninth Street, MS-15
Sacramento, CA 95814
asolomon@energy.state.ca.us

DOCKET

09-AFC-6

DATE FEB 16 2010

RECD. FEB 17 2010

RE: Chevron Energy Solutions and Solar Millennium Proposed Solar Thermal Power Plants on Public Lands Located Near Palen (Docket #09-AFC-6) and Blythe (Docket #09-AFC-7) in Eastern Riverside County

Dear Mr. Solomon:

Thank you for notifying the County of Riverside of the above-referenced projects. Staff has reviewed the Application for Certification (AFC) submitted to the California Energy Commission (CEC) by Solar Millennium, LLC, and Chevron Energy Solutions (hereafter "Applicants") and the Notice of Intent (NOI) to prepare two (2) joint environmental impact statements, draft land use plan amendments and preliminary staff assessments.

Staff's understanding is that this Notice and the associated documentation provided by the Applicant are to identify environmental issues of potential concern. The forthcoming draft environmental documents will comply with the requirements of both the National Environmental Policy Act (NEPA) and the California Environmental Quality Act (CEQA).

The Riverside County General Plan Land Use Element identifies that both project areas are located in the Rural Foundation Component and designated Rural Desert (R:RD). Moreover, the Land Use Summary Table, which provides allowable uses in each land use designation, includes renewable energy uses such as solar, geothermal and wind energy uses as well as the associated uses required to develop and operation these renewable energy sources. Support of the development of alternative renewable energy sources are reflected in the policies contained in the General Plan and this information is accurately reflected in the Applicant's documentation. However, both project sites are located primarily on federal lands and development of federal lands is not subject to local land use or zoning restrictions.

This being stated, the regional significance of the Projects as well as the number of similar type projects being proposed at this time in eastern Riverside County is of concern. The documents provided by the Applicants' appear to minimize potential project specific impacts in areas such as long-term land use compatibility, visual/scenic resources and surface hydrology. Furthermore, the documents failed to address the cumulative impacts under many of the environmental issues (e.g., visual/scenic resources). A statement that individual project impacts would be required to be mitigated on a project specific basis is not sufficient nor is the supposition that many of the proposed projects included in the cumulative analysis may never be constructed.

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Due to the magnitude of the proposed Projects and the lack of detailed mapping, staff is unable to provide substantive comments at this time and reserves the right to comment further upon receipt of the draft environmental document.

To assist County staffs' review, the draft environmental document should include:

1. Comprehensive mapping of the affected areas which includes township, range and section numbers and clearly depicts project location in reference to surrounding County landmarks.
2. A large-scale topographic map with sufficient street detail for staff to determine potential impacts on, but not limited to, scenic vistas and/or resources (views), watercourses, regional and local trail systems, designated Off Highway Vehicle (OHV) areas, land use, traffic/circulation, areas of historical/cultural resources, hazards, health effects as a result of new or increased Electric and Magnetic fields (EMFs) on operations staff and mitigation included to avoid and/or reduce such impacts.
3. A large-scale cumulative impacts map which includes township, range and section numbers, existing structures and/or facilities, proposed locations of all cumulative projects in the area, proposed substations and transmission line routes to proposed interconnection points and comprehensive feasible mitigation measures which could be applied to all similar type projects to reduce impacts which might otherwise be mitigated individually.
4. The draft environmental document should address how the proposed Projects will demonstrate consistency with the Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP), if applicable.
5. The Riverside County Transportation Department should be contacted to discuss Project details (public access roads, County rights-of-way, easements, circulation, etc.).

Thank you for staff's comments and I look forward to receiving a copy of the draft environmental document when available. If you should have any questions regarding these comments, please contact Kathleen Browne, Planning Department, at (951) 955-4949.

Sincerely,

RIVERSIDE COUNTY PLANNING DEPARTMENT
Ron Goldman, Planning Director


Jerry Jolliffe, Deputy Planning Director

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Table LU-4 Land Use Designations Summary

Foundation Component	Area Plan Land Use Designation	Building Intensity Range (du/ac or FAR) ^{1,2,3}	Notes
Agriculture	Agriculture (AG)	10 ac min.	<ul style="list-style-type: none"> Agricultural land including row crops, groves, nurseries, dairies, poultry farms, processing plants, and other related uses. One single-family residence allowed per 10 acres except as otherwise specified by a policy or an overlay.
Rural	Rural Residential (RR)	5 ac min.	<ul style="list-style-type: none"> Single-family residences with a minimum lot size of 5 acres. Allows limited animal keeping and agricultural uses, recreational uses, compatible resource development (not including the commercial extraction of mineral resources) and associated uses and governmental uses.
	Rural Mountainous (RM)	10 ac min.	<ul style="list-style-type: none"> Single-family residential uses with a minimum lot size of 10 acres. Areas of at least 10 acres where a minimum of 70% of the area has slopes of 25% or greater. Allows limited animal keeping, agriculture, recreational uses, compatible resource development (which may include the commercial extraction of mineral resources with approval of a SMP) and associated uses and governmental uses.
	Rural Desert (RD)	10 ac min.	<ul style="list-style-type: none"> Single-family residential uses with a minimum lot size of 10 acres. Allows limited animal keeping, agriculture, recreational, renewable energy uses including solar, geothermal and wind energy uses, as well as associated uses required to develop and operate these renewable energy sources, compatible resource development (which may include the commercial extraction of mineral resources with approval of SMP), and governmental and utility uses.
Rural Community	Estate Density Residential (RC-EDR)	2 ac min.	<ul style="list-style-type: none"> Single-family detached residences on large parcels of 2 to 5 acres. Limited agriculture, intensive equestrian and animal keeping uses are expected and encouraged.
	Very Low Density Residential (RC-VLDR)	1 ac min.	<ul style="list-style-type: none"> Single-family detached residences on large parcels of 1 to 2 acres. Limited agriculture, intensive equestrian and animal keeping uses are expected and encouraged.
	Low Density Residential (RC-LDR)	½ ac min.	<ul style="list-style-type: none"> Single-family detached residences on large parcels of ½ to 1 acre. Limited agriculture, intensive equestrian and animal keeping uses are expected and encouraged.
Open Space	Conservation (C)	N/A	<ul style="list-style-type: none"> The protection of open space for natural hazard protection, and natural and scenic resource preservation. Existing agriculture is permitted.
	Conservation Habitat (CH)	N/A	<ul style="list-style-type: none"> Applies to public and private lands conserved and managed in accordance with adopted Multi Species Habitat and other Conservation Plans.
	Water (W)	N/A	<ul style="list-style-type: none"> Includes bodies of water and natural or artificial drainage corridors. Extraction of mineral resources subject to SMP may be permissible provided that flooding hazards are addressed and long term habitat and riparian values are maintained.
	Recreation (R)	N/A	<ul style="list-style-type: none"> Recreational uses including parks, trails, athletic fields, and golf courses. Neighborhood parks are permitted within residential land uses.
	Rural (RUR)	20 ac min.	<ul style="list-style-type: none"> One single-family residence allowed per 20 acres. Extraction of mineral resources subject to SMP may be permissible provided that scenic resources and views are protected.
	Mineral Resources (MR)	N/A	<ul style="list-style-type: none"> Mineral extraction and processing facilities. Areas held in reserve for future mineral extraction and processing.
Community Development	Estate Density Residential (EDR)	2 ac min.	<ul style="list-style-type: none"> Single-family detached residences on large parcels of 2 to 5 acres. Limited agriculture and animal keeping is permitted, however, intensive animal keeping is discouraged.

Very Low Density Residential (VLDR)	1 ac min.	<ul style="list-style-type: none"> Single-family detached residences on large parcels of 1 to 2 acres. Limited agriculture and animal keeping is permitted, however, intensive animal keeping is discouraged.
Low Density Residential (LDR)	½ ac min.	<ul style="list-style-type: none"> Single-family detached residences on large parcels of ½ to 1 acre. Limited agriculture and animal keeping is permitted, however, intensive animal keeping is discouraged.
Medium Density Residential (MDR)	2 - 5 du/ac	<ul style="list-style-type: none"> Single-family detached and attached residences with a density range of 2 to 5 dwelling units per acre. Limited agriculture and animal keeping is permitted, however, intensive animal keeping is discouraged. Lot sizes range from 5,500 to 20,000 sq. ft., typical 7,200 sq. ft. lots allowed.
Medium High Density Residential (MHDR)	5 - 8 du/ac	<ul style="list-style-type: none"> Single-family attached and detached residences with a density range of 5 to 8 dwelling units per acre. Lot sizes range from 4,000 to 6,500 sq. ft.
High Density Residential (HDR)	8 - 14 du/ac	<ul style="list-style-type: none"> Single-family attached and detached residences, including townhouses, stacked flats, courtyard homes, patio homes, townhouses, and zero lot line homes.
Very High Density Residential (VHDR)	14 - 20 du/ac	<ul style="list-style-type: none"> Single-family attached residences and multi-family dwellings.
Highest Density Residential (HHDR)	20+ du/ac	<ul style="list-style-type: none"> Multi-family dwellings, includes apartments and condominium. Multi-storied (3+) structures are allowed.
Commercial Retail (CR)	0.20 - 0.35 FAR	<ul style="list-style-type: none"> Local and regional serving retail and service uses. The amount of land designated for Commercial Retail exceeds that amount anticipated to be necessary to serve the County's population at build out. Once build out of Commercial Retail reaches the 40% level within any Area Plan, additional studies will be required before CR development beyond the 40 % will be permitted.
Commercial Tourist (CT)	0.20 - 0.35 FAR	<ul style="list-style-type: none"> Tourist related commercial including hotels, golf courses, and recreation/amusement activities.
Commercial Office (CO)	0.35 - 1.0 FAR	<ul style="list-style-type: none"> Variety of office related uses including financial, legal, insurance and other office services.
Light Industrial (LI)	0.25 - 0.60 FAR	<ul style="list-style-type: none"> Industrial and related uses including warehousing/distribution, assembly and light manufacturing, repair facilities, and supporting retail uses.
Heavy Industrial (HI)	0.15 - 0.50 FAR	<ul style="list-style-type: none"> More intense industrial activities that generate significant impacts such as excessive noise, dust, and other nuisances.
Business Park (BP)	0.25 - 0.60 FAR	<ul style="list-style-type: none"> Employee intensive uses, including research & development, technology centers, corporate offices, "clean" industry and supporting retail uses.
Public Facilities (PF)	≤ 0.60 FAR	<ul style="list-style-type: none"> Civic uses such as County administrative buildings and schools.
Community Center (CC)	5 - 40 du/ac 0.10 - 0.3 FAR	<ul style="list-style-type: none"> Includes combination of small-lot single family residences, multi-family residences, commercial retail, office, business park uses, civic uses, transit facilities, and recreational open space within a unified planned development area. This also includes Community Centers in adopted specific plans.
Mixed Use Planning Area		<ul style="list-style-type: none"> This designation is applied to areas outside of Community Centers. The intent of the designation is not to identify a particular mixture or intensity of land uses, but to designate areas where a mixture of residential, commercial, office, entertainment, educational, and/or recreational uses, or other uses is planned.

Overlays and Policy Areas

Overlays and Policy Areas are not considered a Foundation Component. Overlays and Policy Areas address local conditions and can be applied in any Foundation Component. The specific details and development characteristics of each Policy Area and Overlay are contained in the appropriate

Area Plan.	
Community Development Overlay (CDO)	<ul style="list-style-type: none"> Allows Community Development land use designations to be applied through General Plan Amendments within specified areas within Rural, Rural Community, Agriculture, or Open Space Foundation Component areas. Specific policies related to each Community Development Overlay are contained in the appropriate Area Plan.
Community Center Overlay (CCO)	<ul style="list-style-type: none"> Allows for either a Community Center or the underlying designated land use to be developed.
Rural Village Overlay (RVO) and Rural Village Overlay Study Area (RVOSA)	<ul style="list-style-type: none"> The Rural Village Overlay allows a concentration of residential and local-serving commercial uses within areas of rural character. The Rural Village Overlay allows the uses and maximum densities/intensities of the Medium Density Residential and Medium High Density Residential and Commercial Retail land use designations. In some rural village areas, identified as Rural Village Overlay Study Areas, the final boundaries will be determined at a later date during the consistency zoning program. (The consistency zoning program is the process of bringing current zoning into consistency with the adopted general plan.)
Watercourse Overlay (WCO)	<ul style="list-style-type: none"> The Watercourse Overlay designates watercourses, including natural or controlled stream channels and flood control channels.
Specific Community Development Designation Overlay	<ul style="list-style-type: none"> Permits flexibility in land uses designations to account for local conditions. Consult the applicable Area Plan text for details.
Policy Areas	<ul style="list-style-type: none"> Policy Areas are specific geographic districts that contain unique characteristics that merit detailed attention and focused policies. These policies may impact the underlying land use designations. At the Area Plan level, Policy Areas accommodate several locally specific designations, such as the Limonite Policy Area (Jurupa Area Plan), or the Scott Road Policy Area (Sun City/Menifee Valley Area Plan). Consult the applicable Area Plan text for details.
<p>NOTES:</p> <p>¹ FAR = Floor Area Ratio, which is the measurement of the amount of non-residential building square footage in relation to the size of the lot. Du/ac = dwelling units per acre, which is the measurement of the amount of residential units in a given acre.</p> <p>² The building intensity range noted is exclusive, that is the range noted provides a minimum and maximum building intensity.</p> <p>³ Clustering is encouraged in all residential designations. The allowable density of a particular land use designation may be clustered in one portion of the site in smaller lots, as long as the ratio of dwelling units/area remains within the allowable density range associated with the designation. The rest of the site would then be preserved as open space or a use compatible with open space (e.g., agriculture, pasture or wildlife habitat). Within the Rural Foundation Component and Rural Designation of the Open Space Foundation Component, the allowable density may be clustered as long as no lot is smaller than ½ acre. This ½ acre minimum lot size also applies to the Rural Community Development Foundation Component. However, for sites adjacent to Community Development Foundation Component areas, 10,000 square foot minimum lots are allowed. The clustered areas would be a mix of 10,000 and ½ acre lots. In such cases, larger lots or open space would be required near the project boundary with Rural Community and Rural Foundation Component areas.</p>	